

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,

Plaintiff,

v.

The City of Nashua, New Hampshire, et al.,
Defendants.

No. 22-cv-00326-LM

**DEFENDANTS INCEPTION TECHNOLOGIES, INC. AND RAYMOND FEOLI'S
MOTION TO DISMISS COUNTS EIGHT AND TEN OF
PLAINTIFF'S VERIFIED COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(6), defendants Inception Technologies, Inc. and Raymond Feoli (collectively, "Defendants") hereby move to dismiss Counts Eight (Defamation) and Ten (Intentional Infliction of Emotional Distress) of the Verified Complaint asserted by Plaintiff Laurie Ortolano. For the reasons set forth in the accompanying Memorandum of Law, Defendants respectfully request that the Court grant this Motion and dismiss Counts Eight and Ten of the Verified Complaint with prejudice.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Defendants respectfully request oral argument.

Respectfully submitted,
Dated: November 18, 2022

Defendants Inception Technologies, Inc.
and Raymond Feoli,

By: /s/ Danilo J. Gomez
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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

/s/ Danilo J. Gomez

Danilo J. Gomez